

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES**

**v.**

**SAMUEL SULLIVAN, JR.**

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**Case No. TDC-21-460**

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**EMERGENCY UNOPPOSED MOTION TO DELAY SENTENCING  
HEARING BY ONE HOUR**

The Defendant, Samuel Sullivan, Jr., by and through his counsel, Michael E. Lawlor, Adam C. Demetriou, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court delay the sentencing hearing in this matter by one hour to September 20, 2023 at 3:30 p.m. In support of this Motion, counsel state as follows:

1. On March 30, 2023, Mr. Sullivan entered a plea of guilty in this case. (Plea Agreement, ECF No. 64.) Mr. Sullivan also admitted to violations of supervised release in case number TDC-10-223.
2. On June 14, 2023, this Court continued the sentencing hearing in this matter to September 20, 2023 at 2:30 p.m.
3. At this time, the undersigned counsel respectfully request that this Court delay the start of the sentencing hearing by one hour, to 3:30 p.m.

4. Last week, lead counsel for Mr. Sullivan, Michael Lawlor, was required to schedule a doctor's appointment. The only time in the near future the appointment could be scheduled was September 20, 2023 at 1:00 p.m. If Mr. Sullivan's sentencing hearing is moved back one hour to 3:30 p.m., Mr. Lawlor will have time to attend the appointment and arrive to court on time.

5. This Motion is unopposed. The undersigned counsel have conferred with AUSA Michael Morgan, who has indicated that the Government does not oppose this request.

6. For these reasons, Mr. Sullivan respectfully requests that this Court delay the sentencing hearing in this matter by one hour to September 20, 2023 at 3:30 p.m.

Respectfully submitted,

/s/

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Michael E. Lawlor  
Adam C. Demetriou  
Brennan, McKenna & Lawlor, Chtd.  
6305 Ivy Lane, Suite 700  
Greenbelt, Maryland 20770  
(301) 474-0044  
[mlawlor@verizon.net](mailto:mlawlor@verizon.net)  
[ademetriou@brennanmckenna.com](mailto:ademetriou@brennanmckenna.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, September 19, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Maryland.

/s/

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Michael E. Lawlor